

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

NURYS D. VENTURA,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.: 1:22-cv-00078-JJM-PAS
v.)	
)	
ROBERT TURNER; RASIER, LLC;)	
and UBER TECHNOLOGIES, INC.,)	
)	
Defendants)	

**DEFENDANT RASIER, LLC'S MOTION TO COMPEL PLAINTIFF TO PROVIDE
HER INITIAL DISCLOSURES, ANSWERS TO INTERROGATORIES AND
RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, the Defendant Rasier, LLC ("Rasier"), hereby moves this Court for an Order compelling the Plaintiff, Nurys D. Ventura (hereinafter "Plaintiff") to serve her initial disclosures and answers to Rasier's interrogatories and her responses to Rasier's Requests for Production of Documents.

As grounds for this Motion, Rasier States as Follows:

1. Plaintiff filed this lawsuit in Providence County Superior Court on October 18, 2021.
2. This matter was removed from Providence County Superior Court on February 16, 2022.
3. The parties were initially noticed for a Rule 16 scheduling conference to take place by telephone on May 10, 2022. The Court cancelled that conference at the request of Plaintiff's counsel on May 10, 2022.
4. On May 16, 2022, the Court issued a scheduling order that calls for fact discovery to be completed on November 15, 2022. See Docket Paper No. 13.
5. Defendants Rasier and Uber Technologies, Inc. served their initial disclosures in accordance with Fed.R.Civ.P. 26 on August 1, 2022.
6. To date, Plaintiff has not provided her initial disclosures as required by Rule 26.

7. Rasier served its interrogatories and requests for production of documents upon the Plaintiff on or about August 18, 2022. See attached **Exhibit A**.
8. Plaintiff's Answers to Rasier's Interrogatories and Responses to Request for Production of Documents were due on or before September 19, 2022.
9. On September 20, 2022 Counsel for Rasier sent an e-mail to Plaintiff's Counsel inquiring on the status of Plaintiff's discovery responses and expressed concern on the Plaintiff's failure to date to provide any information concerning the claim. See attached **Exhibit B**.
10. To date, the Plaintiff has failed to object or otherwise respond to any of Rasier's discovery requests.
11. Given the rapidly approaching discovery deadline, Rasier requests this Court issue an Order compelling Plaintiff to provide complete discovery responses and her initial disclosures within ten (10) days of any Order issued by the Court.

Pursuant to Fed.R.Civ.P. 37(a)(1), counsel certifies that Rasier has in good faith conferred or attempted to confer with the person or party failing to make the discovery in an effort to secure the information or material without court action.

WHEREFORE, defendant, Rasier, requests that this Court issue an Order compelling Plaintiff to answer interrogatories and respond to requests for production of documents within ten (10) days of an order issued by this Court, together with such other and further relief the Court deems just and proper.

Respectfully submitted by,
Defendants
RASIER, LLC,
By their attorneys,

/s/ Andrew R. Ferguson

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CERTIFICATE OF SERVICE

I, Andrew R. Ferguson, hereby certify that on this 26th day of September, 2022, I served a copy of the within document upon all counsel of record via e-mail:

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/s/ Andrew R. Ferguson

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